

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

JOHN DOE,

Plaintiff,

-against-

COLGATE UNIVERSITY, COLGATE UNIVERSITY
BOARD OF TRUSTEES, JEFFREY HERBST,
individually and as agent for Colgate University,
SUZY M. NELSON, individually and as agent for
Colgate University, KIMBERLY TAYLOR,
individually and as agent for Colgate University,
MARILYN RUGG, individually and as agent for
Colgate University, VALERIE BROGAN,
individually and as agent for Colgate University,
and TAMALA FLACK, individually and as agent
for Colgate University,

Defendants.

X : Civil Action No: 5:15-CV-1069
: (LEK/DEP)

X

**MOTION TO PROCEED UNDER
PSEUDONYM AND FOR PROTECTIVE ORDER**

The undersigned attorneys hereby move this Court to allow the Plaintiff in the above captioned action to proceed under the pseudonym John Doe for the reasons set forth in the attached Plaintiff's Memorandum of Law in Support of Plaintiff's Motion to Proceed Under Pseudonym and for Protective Order and the Declaration of Andrew T. Miltenberg, Esq. In Support of Plaintiff's Motion to Proceed Under Pseudonym and for Protective Order.

Dated: New York, New York
September 15, 2015

Respectfully submitted,

NESENOFF & MILTENBERG, LLP
Attorneys for Plaintiff John Doe

By: /s/ Andrew T. Miltenberg
Andrew T. Miltenberg, Esq. (517014)
Tara J. Novack, Esq. (*admission
pending*)

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